IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL CORP.,)
Plaintiff,)) No. 1:17-mc-00151-LPS
v.)
BOLIVARIAN REPUBLIC OF VENEZUELA,)
Defendant.)

CITGO AND PDVH DISCLOSURE OF EXPERT WITNESSES

Pursuant to the scheduling order entered on June 13, 2025 (D.I. 1809), PDV Holding, Inc. ("PDVH") and CITGO Petroleum Corporation ("CITGO"), hereby give notice of expert testimony submitted in support of their forthcoming objections to the Special Master's Final Recommendation (D.I. 1837), copies of which will be served on the Special Master on July 7, 2025.

Expert Witness	Subject of Testimony
Dr. Jose Alberro	Valuation of the PDVH Shares
Randall J. Weisenburger	Defects in the Sale Process

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July 7, 2025